



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

July 16, 1999

Magalie Roman Salas, Secretary  
Federal Communications Commission  
Portals II  
445 12 Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

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Re: State Utility Commission Request for Additional Authority to Implement  
Telecommunications Numbering Conservation Measures  
CC Docket No. 96-98  
NSD File No. L-98-136  
NSD File No. L-99-19  
NSD File No. L-99-21  
NSD File No. L-99-27  
NSD File No. L-99-33

Dear Secretary Salas:

Enclosed for filing and consideration in the above-captioned proceeding is the Comment on the State Utility Commission Requests for Authority to Implement Telecommunications Numbering Conservation Measures on behalf of the Pennsylvania Public Utility Commission. An original and four (4) copies are included. Additionally, I have enclosed a copy to be time-stamped and returned to me in the attached self-addressed envelope.

Our comments are crucial to the Commission's consideration of the filing, and address important underlying issues of state concern.

Very truly yours,

David E. Screven  
Assistant Counsel

Enclosures

cc: As per Certificate of Service

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of:	: CC Docket 96-98
	:
Petition of the California PUC and the	: NSD File No. L-98-136
People of the State of California for an	:
Additional Delegation of Authority to	:
Conduct NXX Code Rationing	:
	:
Massachusetts DTE Request for Additional	: NSD File No. L-99-19
Authority to Implement Various Area	:
Code Conservation Measures in the 508,	:
617, 781, and 978 Area Codes	:
	:
New York DPS Petition for Additional	: NSD File No. L-99-21
Authority to Implement Number	:
Conservation Measures	:
	:
Maine PUC's Petition for Additional	: NSD File No. L-99-27
Authority to Implement Number	:
Conservation Measures	:
	:
Florida PSC's Petition for Authority	: NSD File No. L-99-33
to Implement Number Conservation	:
Measures	:

**COMMENT of the PENNSYLVANIA PUBLIC UTILITY COMMISSION**

The Pennsylvania Public Utility Commission ("the PaPUC") has considerable experience with the increasing number of area code and numbering concerns emerging in the states. Currently, Pennsylvania is in the midst of NPA Relief Planning activities for the 412 and 724 NPAs located in Western Pennsylvania. A geographical split was just implemented in this region in July of 1997 and fully completed by August of 1998. Each NPA had a projected life of approximately six years. Nevertheless, based upon 1999

Central Office Code Utilization Survey (COCUS) projections, the 412 NPA is scheduled to exhaust during the third quarter of 2001, and the 724 NPA is scheduled to exhaust during the first quarter of 2002.

Due to the inability of the PaPUC to order effective conservation measures coupled with the inefficient allocation of numbering resources, this region is again faced with a jeopardy situation less than two years after relief was granted. Based upon these experiences, the PaPUC urges the Commission to give serious consideration to the various state utility commission requests for authority to address area code and numbering concerns within their jurisdictions.

The PaPUC is of the belief, consistent with its pending Petition for Reconsideration of the Federal Communications Commission's Pennsylvania Numbering Order<sup>1</sup>, and similar pleadings filed with this Commission, that states should be given the option of addressing numbering concerns when the industry is unable or unwilling to address them satisfactorily. Moreover, the PaPUC also desires this Commission to allow states the option of exercising authority, both before and after area code and numbering relief plans have been implemented.

Additionally, the PaPUC strongly urges the FCC to endorse an industry system that includes realistic business confidentiality measures, effective incentives to prevent the unauthorized divulgence of confidential information and an "optional appeal" to the state commission on any NANC-NANPA-Industry determination by a party whose business interests are unreasonably harmed by any NANC-NANPA-Industry decision.

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<sup>1</sup> *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Order Regarding Area Codes 412, 610, 215, and 717, and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Memorandum Opinion and Order and Order on Reconsideration, FCC 98-224, CC Docket No. 96-98, NSD File No. L-97-42, (rel. September 28, 1998).*

Finally, the PaPUC urges this Commission to take the action necessary so as to ensure that the North American Numbering Plan Administrator (NANPA) and the North American Numbering Council (NANC) evolve into the independent industry bodies they must become if they are to effectively address and resolve the myriad of area code and numbering problems that are emerging across the nation. The PaPUC is concerned that, in the absence of such an approach, viable competition will be hobbled by the increased number of costly and unpopular area code splits and overlays which contribute to the acceleration in the consumption rate of scarce numbering resources.

The PaPUC believes that there are more effective ways of managing these numbering dilemmas and that individual states should be empowered to craft specialized resolutions that are responsive to local concerns within the area of the states' jurisdictions when the industry has failed to implement such measures.

The PaPUC supports the efforts of each state utility commission in proposing viable solutions to their numbering concerns. Moreover, in the future, states such as Pennsylvania, which have similar numbering concerns, should also have the option of proposing the same number conservation methods when implementing conservation measures for the area codes under their jurisdiction.

The PaPUC desires that the Federal Communication Commission act in an expeditious manner on the instant petitions, and grant some form of interim delegation to all states facing the dilemma resulting from the rapid implementation of new area codes.

Respectfully submitted,



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Assistant Counsel

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Deputy Chief Counsel

Bohdan R. Pankiw  
Chief Counsel

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Dated: July 16, 1999

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of:	:
	:
Petition of the California PUC and the People of the State of California for an Additional Delegation of Authority to Conduct NXX Code Rationing	: NSD File No. L-98-136 : : : :
Massachusetts DTE Request for Additional Authority to Implement Various Area Code Conservation Measures in the 508, 617, 781, and 978 Area Codes	: NSD File No. L-99-19 : : : :
New York DPS Petition for Additional Authority to Implement Number Conservation Measures	: NSD File No. L-99-21 : : :
Maine PUC's Petition for Additional Authority to Implement Number Conservation Measures	: NSD File No. L-99-27 : : :
Florida PSC's Petition for Authority to Implement Number Conservation Measures	: NSD File No. L-99-33 : :

**CERTIFICATE OF SERVICE**

I, David E. Screven, hereby certify that I have this 15th day of July, 1999, served an original and four true and correct copies of the Pennsylvania Public Utility Commission's Comment on the Various State Utility Commissions' Petitions for Additional Authority to Implement Number Conservation Measures upon the Secretary of the Federal Communications Commission by Federal Express and that I have served a true and correct copy of the Petition upon the other persons listed below by first class mail:

**Federal Express:**

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Dated: July 16, 1999